

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

B.E. TECHNOLOGY, LLC,

Plaintiff,

VS.

AMAZON DIGITAL SERVICES, INC.,

Defendant.

No.: 2:12-cv-02767-JPM-tmp

JURY DEMAND

**DEFENDANT AMAZON DIGITAL SERVICES, INC.’S MOTION TO TRANSFER
VENUE PURSUANT TO 28 U.S.C. § 1404(a) AND FOR EXPEDITED CONSIDERATION
(WITH CERTIFICATE OF CONSULTATION)**

Defendant Amazon Digital Services, Inc. (“Amazon”) respectfully moves this Court for an order transferring this case to the United States District Court for the Northern District of California pursuant to 28 U.S.C. § 1404(a). This Motion is based on the accompanying Memorandum of Points and Authorities, the supporting declarations of Jeffrey Dean and Amanda Hudson, the pleadings and records on file in the action, and upon such additional evidence and argument as may be presented. Given that this Motion may result in transfer of this case out of this District and in light of fast-approaching deadlines under this Court’s Local Patent Rules, Amazon respectfully requests an expedited consideration of this Motion.

Respectfully, submitted,

s/Mark Vorder-Bruegge, Jr.

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Counsel for Defendant

AMAZON DIGITAL SERVICES, INC.

CERTIFICATE OF COMPLIANCE

I, Glen Reid, attorney for defendant, certify that I talked to Richard Carter on December 7, 2012 regarding defendant's intention to file the foregoing motion, and conferred with him to determine whether the plaintiff would agree to the relief sought, such that the motion could be presented as unopposed. The consultation was not successful and Mr. Carter advised that the plaintiff opposes the motion.

s/Glen G. Reid, Jr.

Glen G. Reid, Jr.

CERTIFICATE OF SERVICE

The foregoing document was filed under the Court's CM/ECF system, automatically effecting service on counsel of record for all other parties who have appeared in this action on the date of such service.

s/Mark Vorder-Bruegge, Jr. _____
Mark Vorder-Bruegge, Jr.

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